



June 25, 2001

Loureiro Engineering Associates, Inc.

Town of East Hartford
Development Department
740 Main Street
East Hartford, CT 06108

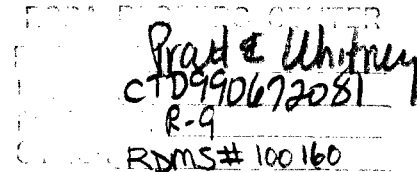


RDMS DocID

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Attn: Michael Dayton, Town Planner

RE: Major Flood Hazard Application
Soil Erosion and Sediment Control Application
Willow Brook and Willow Brook Pond
Status of Section 404 and Section 401 Permits



Dear Mr. Dayton:

We have prepared this letter on behalf of our client, United Technologies Corporation, Pratt & Whitney Division (UTC/P&W), to transmit 12 copies of the following documents:

- June 13, 2001 Army Corps of Engineers (ACOE) provisional permit for the Willow Brook and Willow Brook Pond PCB Remediation Project; and
- June 18, 2001 State of Connecticut Department of Environmental Protection Notice of Tentative Determination – 401 Water Quality Certification.

The ACOE provisional permit outlines terms and conditions to be attached to the final Section 404 permit. To obtain the final permit, UTC/P&W must obtain the 401 Water Quality Certification and submit a permit fee of \$100.00. Page 2 and Page 4 of the provisional permit set forth the three special conditions for the permit. As can be seen, the conditions are insignificant and require:

1. Posting of the permit at the project site;
2. The inclusion of the permit and associated application in any contract or subcontracts issued for the performance of the work; and
3. The performance of mitigation in accordance with a final mitigation plan to be submitted to the ACOE by September 30, 2001.

With regard to the 401 Water Quality Certification, we have attached to this letter the Department of Environmental Protection (DEP) Notice of Tentative Determination to approve the UTC/P&W application. We understand that a member of the East Hartford Engineering staff has been in contact with a DEP representative. During that conversation, the DEP representative indicated that the 401 Water Quality Certification would be issued immediately upon completion of the 30-day public comment period. The public comment period will end on July 18, 2001. As such, we fully expect the receipt of the 401 Water Quality Certification by no later than July 20,



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2001. Though we can make no assertion regarding the outcome of the public comment period, we can express the lack of comment from previous experience on this project. To date, each aspect of the project has been subject to public comment on five separate occasions during the period from February 14, 2001 to the present. To date, we are aware of only one public comment and that was received during the Public Hearing for the East Hartford Wetlands Commission application for the project. The comment was made in regard to the plans for installing a fence along the northern periphery of the project and commenter wanted to ensure that the fence would not impinge on their property.

In summary, we are herein providing the Commission with additional information regarding the status of the issuance of permits under Section 401 and 404 of the Federal Clean Water Act. As indicated above, we have received the provisional Section 404 permit and anticipate the receipt of the 401 Water Quality Certification by no later than July 20, 2001. We respectfully request that the Commission consider the application, our responses to comments, and this supplemental information and approve the Major Flood Hazard and Soil Erosion and Sedimentation Control Applications with the condition that UTC/P&W must submit to the Commission copies of the final permits and appear before the Commission to request an amendment to the approval if the final permits contain a condition that would result in a significant alteration to documents submitted to the Commission. With the approval of the Commission, UTC/P&W can achieve their commitment to the implementation of the project during this construction year. Should you have any further questions or comments, please do not hesitate to contact Lauren Levine of UTC/P&W at (860) 728-6520 or me.

Sincerely,

LOUREIRO ENGINEERING ASSOCIATES, INC.

Brian A. Cutler, P.E.
Vice President

Attachments

cc: Lauren Levine, UTC/P&W
Elsie Patton, DEP, w/o attachments
Richard Hathaway, DEP, w/o attachments
Melissa Toni, DEP, w/o attachments
Cori Rose, ACOE, w/o attachments
[REDACTED]



Attachment No. 1

June 13, 2001

**Army Corps of Engineers (ACOE) Provisional Permit
Willow Brook and Willow Brook Pond PCB Remediation Project**



Attachment No. 2

June 18, 2001

**State of Connecticut Department of Environmental Protection
Notice of Tentative Determination
401 Water Quality Certification**



June 22, 2001

Loureiro Engineering Associates, Inc.

Town of East Hartford
Development Department
740 Main Street
East Hartford, CT 06108

Attn: Michael Dayton, Town Planner

RE: Major Flood Hazard Application
Willow Brook and Willow Brook Pond
Response to June 13, 2001 Comments

Dear Mr. Dayton:

We have prepared this letter on behalf of our client, United Technologies Corporation, Pratt & Whitney Division (UTC/P&W), to provide responses to each of the comments raised in the staff review forms issued June 12, 2001, and received by LEA June 13, 2001. This letter is formatted to provide the title of the reviewing authority in bold, followed by each of the respective comments from the reviewing authority, followed by the response to each individual comment in italics.

Administrative review – Inspections and Permits

1. The submitted plan does not indicate measures for abatement or control of anticipated nuisances (traffic/odor/noise/dust).

We assume that the commenter did not have the opportunity to review our addendum package submitted on May 29, 2001 or the Soil Erosion and Sediment Control Certification application package. The Addendum package addresses anticipated traffic nuisances in a detailed traffic management plan. As detailed in the Traffic Management Plan, the location of the project allows for the routing of truck traffic in such a manner to minimize the amount of traffic on Town of East Hartford streets. The anticipated nuisance of dust generation is addressed in a specific Dust Control Plan that was included in the Soil Erosion and Sediment Control Certification application package. The measures to control anticipated odors during the performance of the project were also addressed as Item No. 8 of the May 29, 2001 addendum package. Measures to address noise are discussed in greater detail in response to Comment No. 2 below.

2. The submitted plan does not indicate compliance with the general provisions of Section 218.4, particularly subsections (f) on hours of operation and (j) on transportation of materials.

While this project is exempt to the requirements of Section 218 as defined in subsection 218.2.i (remediation related activities), UTC/P&W is very sensitive to the need to minimize ancillary impacts associated with the project on the surrounding neighborhood.



To that end, we have addressed both issues as part of the project planning and permit acquisition activities. The proposed hours of operation have been discussed directly with Lt. Steven Nettleton of the East Hartford Police Department. Lt Nettleton indicated that there presently is no noise ordinance in town, as such, the hours of operation are not limited by ordinance. We discussed the proposed activities and described the expected equipment and related noise expected. Lt. Nettleton made several suggestions to avoid potential nuisance noise issues. These suggestions were the basis for the proposed hours of operation stated in the May 29, 2001 Traffic Management Plan. These hours of operation were 7 a.m. to 7 p.m. Monday through Saturday with louder operations performed between 8 a.m. and 6 p.m. Monday through Saturday.

With regard to the issue of transportation of materials, the material being disposed of at an offsite, out-of-state location is contaminated. As such, very specific and restrictive Department of Transportation regulations apply to the transportation of the materials. All trucks must be decontaminated prior to leaving the site. This activity will include removal of all soil from the tires and exterior body of the tractor and trailer through the use of the following types of activities: pressure washing; tire wash-line; and/or dry scrubbing. Delivery trucks transporting clean backfill materials to the site will be directed through paved areas to mitigate the potential of tracking mud and wet material throughout the site. Onsite roads within the limits of the project will be cleaned of all dust, dirt and mud on an as-needed basis and inspections will be performed of points of entrance and egress from the project site to ensure that soil will not be tracked beyond these limits.

Administrative review – Public Health

1. The sanitarian expressed a concern with the potential for septic odors from the excavated materials.

We share the global concern regarding the potential for materials within the pond and stream channel to emit odors and have given considerable attention to this issue. The preventative measures of physically covering the stockpiles over-night with polyethylene sheeting, using mechanical spray or dispersion methods and/or broadcast application of malodor neutralizing products shall be implemented if needed.

LEA is presently working with a company called Odor Control Company, Inc. This company, as suggested by the name, is exclusively involved in the manufacture and application of odor controlling substances in the wastewater, landfill and farming industries. Based on our needs, an odor-neutralizing compound distributed at specific locations throughout the downwind area of the site was recommended. The compound would be introduced to the atmosphere via emitters or expelled through a compressed air



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and nozzle system. This approach is commonly and successfully used to neutralize odors associated with, for example, an odor emitting process at a wastewater treatment plant.

As an alternative to this approach, the referenced firm suggested the use of odor neutralizing granules if the malodorous source is a widespread area. The granules would be broadcast throughout the offending area at a specific application rate and the product similarly neutralizes the odors emitted from the peat/muck. This approach is commonly and successfully used to neutralize odors associated with widespread source distribution such as farm lagoons and fertilized crop lots.

We are confident that the controls proposed will be sufficient to address the potential odor emissions generated from this project. Pratt & Whitney has over 8,000 employees working adjacent to this project that could be similarly impacted by nuisance odors. As such, the applicant shares the interests of the community.

We appreciate the comments to the project. We hope that as we continue to respond to comments raised, that we are effectively demonstrating the level of commitment on the part of UTC/P&W to the successful completion of this project in a manner minimizing inconveniences to the Town and its residents. To that end, we also hope that the above responses adequately address the staff comments and meet with your satisfaction. As we have indicated on numerous occasions, UTC/P&W is fully committed to the implementation of this project during the 2001 construction season. Your concurrence with the approach set forth in the applications is an essential element to the recognition of this goal. Should you have any further questions or comments, please do not hesitate to contact Lauren Levine of UTC/P&W at (860) 728-6520 or me.

Sincerely,

LOUREIRO ENGINEERING ASSOCIATES, INC.

Brian A. Cutler, P.E.
Vice President

cc: Lauren Levine, UTC/P&W
Elsie Patton, DEP
Richard Hathaway, DEP
Melissa Toni, DEP
Cori Rose, ACOE

[REDACTED]



Loureiro Engineering Associates, Inc.

June 21, 2001

**State of Connecticut
Department of Environmental Protection
Bureau of Water Management
Permitting, Enforcement & Remediation Division
79 Elm Street
Hartford, CT 06106**

Attn.: Mr. Richard C. Hathaway, Jr.

**RE: November 2000, Revised May 2001
Remedial Action Work Plan
Willow Brook and Willow Brook Pond
Response to DEP Comments**

Dear Mr. Hathaway:

Loureiro Engineering Associates, Inc. (LEA) has prepared this letter on behalf of our client, United Technologies Corporation, Pratt & Whitney Division (UTC/P&W), to provide responses to the comments raised on June 8, 2001 in regards to the above-referenced document. This letter is formatted to provide the topic of each comment followed by the response to the comment in italics.

Energy Dissipator/Cap Construction Integration

Partial bypass of the channel during construction of the energy dissipater will be necessary. This bypass would be accomplished by installing temporary sandbag (or other appropriate material) dams to create protected work cells within the brook bed and adjacent areas to facilitate the riprap cap and dissipator section construction.

The energy dissipator is to be provided with 27-inches of modified riprap and the channel section is to be provided with at least 24-inches of modified riprap. The dissipater will be reconfigured at project completion by simply adding or removing riprap to conform to the channel design desired. An artifact of this will be that the riprap protection layer of the cap within the energy dissipator area may be thicker than is required for the channel section.

The expected sequence of operations associated with construction of the energy dissipator are as follows:

- 1. Construct bypass channel from upstream to down stream, and downstream to upstream excluding connections to Willow Brook at east and west ends of project.*



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2. *Construct temporary cofferdam within Willow Brook to facilitate the construction of the energy dissipator and cap using temporary sand bags or other effective structure. Bypass pump stream flow to Main Street culvert during construction of dissipator and cap.*
3. *Excavate stream channel sediment necessary to allow construction on dissipator and cap within the limits defined in the drawings. Install geotextile and 9-inch organic soil layer as detailed and to the grades necessary to construct the 27-inch intermediate riprap dissipator and related flat apron scour protection to the dimensions and elevations shown.*
4. *Upon completion of the dissipator and cap, remove the temporary cofferdam and allow the brook to flow over the newly constructed structures.*
5. *Finalize tie-in to by-pass channel to facilitate bypass of Willow Brook.*

Dust Control

LEA has reviewed the dust control plan developed specifically for this project. More specifically we have further evaluated the action level of 10 mg/m^3 particulate concentration. The proposed action level represents the lower of the Occupation Health and Safety Administration (OSHA) permissible exposure level (PEL) of 15 mg/m^3 and the National Institute of Occupational Safety and Health (NIOSH) recommended exposure limit (REL) of 10 mg/m^3 for nuisance dust. Both of which are based on an 8-hour time weighted average measurement. We are proposing to take corrective actions in the event a single instantaneous measurement exceeds the 10 mg/m^3 threshold, adding a potentially significant safety factor.

Particulate monitoring is proposed during the performance of work on the project, which could generate dust. As defined in the Dust Control Plan, particulate monitoring will be performed by walking the perimeter of the project area with a portable particulate monitor at a frequency of once per day when: 1) precipitation has not occurred during the previous 24 hours; and 2) when work is being performed at the site. Dust monitoring will be performed on a more frequent basis if the above monitoring indicates an exceedance of the 10 mg/m^3 standard for the project. Weekend particulate monitoring will be performed if needed, based on forecasted weather conditions and site conditions. The monitoring program proposed in the Dust Control Plan will be implemented on weekends or off workdays if dry and windy weather conditions are forecasted. Control measures, as defined in the Plan, will be implemented at any time if particulate monitoring indicates an exceedance of the 10 mg/m^3 standard.

It should be noted, the intent of the Dust Control Plan for this project is to mitigate the opportunity for dust generation during both working and non-working periods. The use of windscreens, polyethylene sheet covers, dust suppression chemicals and water misting measures will be implemented as needed to proactively mitigate dust generation.



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Excavation of Sediment in the Vicinity of Location ID WT-SD-47

Sediment sample WT-SD-47 is located along the northeastern bank of upper Willow Pond. The analytical data for this location exhibits elevated levels of SVOCs relative to other locations within the pond limits. Although a pond cap is proposed within this particular location, in response to the concerns raised, the location of this sample will be excavated, regardless of PCB concentrations, prior to the construction of the cap.

Sediment Accumulation in Manholes and Catch Basins

There are several hundred individual catch basins present at the Pratt & Whitney East Hartford facility. The P&W East Hartford facility has a catch basin and manhole maintenance program that has been in place as part of the Stormwater Pollution Prevention Plan for the facility since at least 1995. As part of this program, catch basins at the site are periodically inspected to ensure that accumulations of sediment, sheen, or floating scum are not present and the catch basins or manholes are properly functioning. In the event accumulations of sediment are noted within a given catch basin or manhole, the condition is noted and Wethersfield Sweeping, a contractor to P&W, is notified of the condition and accumulated sediment within the catch basin or manhole is evacuated. The records of the inspections and the evacuation activities are maintained on file at P&W and are available for inspection. As a result of this program, we are confident that those stormwater outfalls that discharge to Willow Brook and Willow Brook Pond have been and will continue to be routinely inspected and accumulated sediment will be removed.

We hope that the above responses adequately address your comments and meet with your satisfaction. If the methods for performing dust control monitoring on weekends and off work days are acceptable to the Department, we will make appropriate revisions to the Dust Control Plan and forward to you for incorporation in the project file. As we have indicated on numerous occasions, UTC is fully committed to the implementation of this project during 2001 construction season. Your concurrence with the approach set forth in the Remedial Action Work Plan is an essential element to the recognition of this goal. Should you have any further questions or comments, please do not hesitate to contact Lauren Levine of UTC at (860) 728-6520 or me.

Sincerely

LOUREIRO ENGINEERING ASSOCIATES, INC.

Brian A. Cutler, P.E.
Vice President



DEP

June 21, 2001

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cc: Lauren Levine, UTC
Juan Perez, U.S. EPA
Kim Tisa, U.S. EPA



Elsie Patton, DEP
Lori Saliby, DEP
Melissa Toni, DEP
Cori Rose, ACOE